

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 8

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DEC 19 2011

Ref: 8EPR-N

Mr. James Christian Federal Highway Administration Division Administrator 2520 West 4700 South, Ste. 9A Salt Lake City, UT 84118

John Njord, Executive Director Utah Department of Transportation 4105 South 2700 West Salt Lake City, UT 84119

Re:

Bangerter and 600 West Final Environmental Impact Statement CEO# 20110122

Dear Messrs. Christian and Njord:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Bangerter and 600 West Final Environmental Impact Statement in accordance with the EPA's responsibilities under the National Environmental Policy Act, 42 U.S.C. Section 4321, *et seq.* and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609. This FEIS was prepared by the U.S. Federal Highway Administration (FHWA) and the Utah Department of Transportation (UDOT).

PROJECT DESCRIPTION

FHWA and UDOT are proposing transportation improvements to reduce congestion and improve safety on the exit ramps from I-15 onto Bangerter Highway and at the intersection of 200 West and Bangerter Highway in Draper, Utah. Bangerter Highway is the main east-west road that serves the southern end of the Salt Lake Valley west of I-15 and provides an important link between I-15 and Interstate 80. Bangerter Highway was designed to be a limited-access facility with access only at major signalized intersections and was primarily designed to carry longer-distance trips between major destinations.

Because of the importance of Bangerter Highway in supporting longer-distance trips between major destinations, the Wasatch Front Regional Council's Regional Transportation Plan identified improvements to Bangerter Highway in the area of 600 West as being necessary to meet the projected travel demand in 2030 and to improve safety and regional mobility.

The final selection of an alternative meeting the purpose and need for the project will be made in the Record of Decision. The FHWA and UDOT have identified the "600 West Interchange with Right Turns Only at 200

West" alternative as the Preferred Alternative based on public scoping comments and on the alternative's ability to meet the requirements of the project's purpose.

EPA COMMENTS

Air Quality

The EPA appreciates the additions to the Draft EIS in response to our comments. Table 3.9-1, National and Utah Ambient Air Quality Standards, was updated to include a 1-hour NO₂ air quality standard, and text was added to include information on 24-hour PM_{2.5} concentrations at the Herriman monitoring station. As a result, the EIS now includes information important to the decision maker and the public regarding air quality status and trends in Salt Lake County.

The EIS anticipates air quality improvements associated with reduced idling time, and EPA has pointed to the potential for future adverse effects from increased VMT facilitated by the project. On balance, EPA finds that the EIS includes sufficient air quality effects information to make an informed decision for a project of this type and scope. Future transportation projects in this area would benefit from a more detailed analysis of mobile source emissions including a comparison of current to future (predicted) emissions.

Water Quality

The EPA thanks FHWA and UDOT for addressing our comments regarding stormwater runoff into the Jordan River. We agree with the EIS's response to our comment that because the dissolved oxygen (DO) impairment in the Jordan River is 25 miles downstream of the project and the Bangerter 600 West Project drainage basin is relatively small compared to the overall Jordan River drainage basin, the project would not likely contribute to DO impacts in the Jordan River.

We also agree with the EIS response that *E. coli* loading to the Jordan River does not have to be quantified for this project. As stated in the EIS response to EPA's comment, the Bangerter 600 West Project does not include trails that could be used by animals or any parks. Therefore, due to the lack of identified sources for *E. coli* associated with the project and based on the information from a literature search which demonstrated that roadways are not a significant contributor of *E. coli*, the proposed project would not likely contribute to additional *E. coli* impairment of the Jordan River.

Thank you for the opportunity to provide comments on the Bangerter and 600 West Final EIS. If you have any questions or would like to discuss our comments, please contact the lead reviewer for this project, Robert Edgar at 303-312-6669.

Sincerely,

Suzanne J. Bohan

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Director, NEPA Compliance and Review Program Office of Ecosystems Protection and Remediation

Enclosure